

R E C E I V E D

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MAR 15 2017

AT 8:30 M
WILLIAM T. WALSH
CLERK

IN RE JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

MDL NO. 16-2738 (FLW) (LHG)

THIS DOCUMENT RELATES TO ALL CASES

**STIPULATION AND PRETRIAL ORDER GRANTING PLAINTIFFS LEAVE TO FILE A
FIRST AMENDED MASTER LONG FORM COMPLAINT AND MODIFYING DEADLINES
RELATED TO RESPONSIVE PLEADINGS PURSUANT TO CASE MANAGEMENT ORDER
NO. ____**

WHEREAS, on January 5, 2017, Plaintiffs, by and through their counsel and pursuant to Case Management Order No. 1 ("CMO-1"), filed their Master Long Form Complaint against Defendants Johnson & Johnson ("J&J"), Johnson & Johnson Consumer Inc. f/k/a Johnson & Johnson Consumer Companies, Inc. ("J&J Consumer"), Imerys Talc America, Inc., f/k/a Luzenac America, Inc., f/k/a Rio Tinto Minerals, Inc. ("Imerys Talc") and Personal Care Products Council ("PCPC") (collectively referred to as "Defendants") (Doc. No. 82); and

WHEREAS, on February 6, 2017, Defendant PCPC filed a Motion to Dismiss the Master Long Form Complaint (Doc. No. 100); and

WHEREAS, pursuant to the March 8, 2017 Stipulation for Extension of Time jointly submitted to the Court, Defendants intend on filing Master Answers to the Master Long Form Complaint on or before the respective due dates for their Master Answers of March 15, 2017 for J&J and J&J Consumer, and March 16, 2017 for Imerys Talc; and

WHEREAS, pursuant to the March 8, 2017 Stipulation for Extension of Time jointly submitted to the Court, Plaintiffs' response and opposition to Defendant PCPC's Motion to Dismiss the Long Form Master Complaint to be due on April 11, 2017; and

WHEREAS, pursuant to the March 8, 2017 Stipulation for Extension of Time jointly submitted to the Court, Defendant PCPC's reply to Plaintiffs' response and opposition to Defendant PCPC's Motion to Dismiss the Long Form Master Complaint to be due on April 25, 2017; and

WHEREAS, Plaintiffs and Defendants PCPC, J & J, J & J Consumer and Imerys Talc have agreed to Plaintiffs filing a First Amended Master Long Form Complaint to be filed by March 14, 2017.

NOW, THEREFORE, it is hereby agreed to by and between Plaintiffs and Defendants PCPC, J & J, J & J Consumer and Imerys Talc, subject to Court approval to be provided for below:

1. Plaintiffs shall have leave to file a First Amended Master Long Form Complaint by March 14, 2017, in the form attached hereto as Exhibit A;
2. Defendants J & J, J & J Consumer and Imerys Talc shall Answer Plaintiffs' First Amended Master Long Form Complaint on or before April 13, 2017;

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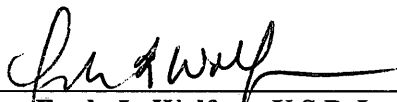
Approved by the Court this

15th

day of

March

, 2017.



Hon. Freda L. Wolfson, U.S.D.J.